

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

MALEEEHA AHMAD, et al., )  
                                  )  
                                  )  
Plaintiffs,                 )  
                                  )  
                                  )  
v.                             )                                  No. 4:17-cv-2455 CDP  
                                  )  
                                  )  
CITY OF ST. LOUIS, MISSOURI, )  
                                  )  
                                  )  
Defendant.                 )

**JOINT MOTION FOR PROTECTIVE ORDER**

The parties respectfully request this Court enter the attached proposed protective order.

On March 18, 2019, Plaintiffs served subpoenas to produce documents upon the respective custodian of records for St. Louis County police department.

To facilitate the production of documents responsive to the subpoenas, the custodian of records, represented by the St. Louis County Counselor's Office, has requested entry of a limited protective order. After negotiations, the parties and the County Counselor agree that the proposed protective order is appropriate to protect the security and privacy interests of the subpoena recipients and the individuals named in responsive documents.

Accordingly, the parties request this Court enter the attached proposed protective order.

Respectfully submitted,

/s/ Anthony E. Rothert

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